

Dear Commissioners,

I do not support several aspects of the Ronald D. Lowrance (RM-10869) plan. I do not believe that retaining the 5 WPM code requirement for the General class license or increasing the 13 WPM code requirement for the Extra class license is in the best interest of Amateur Radio's future.

I would like to express my enthusiasm and support for the proposal set forth by the ARRL--the National Association for Amateur Radio as expressed in RM-10867. I believe that this proposal sets the best course for Amateur Radio's future, and I urge the commission to rule in favor of RM-10867 as quickly as possible.

RM-10867 does the best job of offering a balance of privileges that will attract new Amateur Radio operators to the service and integrate them into the HF mainstream of the hobby. It provides a clear path and incentive for acquiring additional knowledge as they seek to upgrade to General and Extra. In addition, it streamlines the licensing structure, which reduces the associated administrative burden to the Commission.

I have been licensed in the Amateur Radio service for 28 years. I enjoy CW and passed the code test when it was 20 WPM. I hope that hams for decades to come will experience the thrill of operating CW. Even so, I believe that the CW requirement has become an unnecessary barrier to entry that, in and of itself, provides no real benefit to the Amateur Radio service.

When presenting Amateur Radio, I have often seen interest by individuals who would be valuable to the service wane when the CW testing requirement has come to light. It is not a matter of intelligence, but one of interest. Many individuals would like to know more about operating procedures, electronic theory, antennas, etc., but the "code barrier", real or imagined, has kept quality individuals from joining our ranks.

Arguments have been made that the CW testing requirement should be retained in case an emergency situation arises. In reality, even if the existing 5 WPM requirement were retained, those operators who did not enjoy CW and continue to upgrade their CW skills would be of little use in an emergency at 5 WPM. Operators who do enjoy CW will hone their skills and will be far more useful in that mode, regardless of whether they tested for it to obtain their license or not.

Ruling in favor of RM-10867 will be an extremely positive step for fulfilling the Commission's goal of ensuring a strong resource of operators in the Amateur Radio Service. A favorable ruling will support the Commission's stated goals:

*(1) to streamline the licensing process*

*(2) to provide licensing rules and operating privileges that allow radio amateurs to continue their tradition of contributing to the advancement of the radio art*

*(3) to implement licensing requirements and operating privileges that are harmonious, to the extent that the licensing requirements pertain to the privileges the operator license authorizes and which constitute the minimum requirements necessary to demonstrate that the control operator of a station can ensure the proper operation of that station*

*(4) to attract and retain technically inclined persons, particularly the youth of our country, and encourage them to learn and to prepare themselves in areas where the United States needs expertise.*

Thank you for your consideration in this matter.

Sincerely,  
G. Scott Davis

Extra Class Amateur Radio Operator – N3FJP